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**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

**In re:**

**PG&E CORPORATION**

**-and-**

**PACIFIC GAS AND ELECTRIC  
COMPANY,**

**Debtors.**

- ☐ Affects PG&E Corporation
- ☐ Affects Pacific Gas and Electric Company
- ☒ Affects both Debtors

*\*All papers shall be filed in the Lead Case,  
No. 19-30088 (DM)*

Bankruptcy Case  
No. 19-30088 (DM)

Chapter 11  
(Lead Case)  
(Jointly Administered)

**MOTION OF THE OFFICIAL  
COMMITTEE OF TORT CLAIMANTS  
PURSUANT TO 11 U.S.C. §§ 105(a), 501  
AND FED. R. BANKR. P. 3001(a),  
3003(c), 5005 AND 9007 FOR ENTRY OF  
AN ORDER (I) ESTABLISHING A BAR  
DATE FOR FILING FIRE CLAIMS,  
(II) APPROVING THE FORM AND  
PROCEDURES FOR NOTICE OF THE  
BAR DATE FOR FIRE CLAIMS, AND  
(III) APPROVING SUPPLEMENTAL  
PROCEDURES FOR NOTICE OF THE  
BAR DATE TO FIRE CLAIMANTS**

Date: June 11, 2019  
Time: 9:30 a.m. (Pacific Time)  
Place: United States Bankruptcy Court  
Courtroom 17, 16th Floor  
San Francisco, CA 94102  
Objection Deadline: June 10, 2019

1 The Official Committee of Tort Claimants (hereafter, the “TCC”) in the above-captioned  
2 chapter 11 cases (the “**Chapter 11 Cases**”) of PG&E Corporation and Pacific Gas and Electric  
3 Company (collectively, the “**Debtors**” or “**PG&E**”), hereby submits this Motion (the “**Motion**”),  
4 pursuant to sections 105(a) and 501 of title 11 of the United States Code (the “**Bankruptcy Code**”),  
5 Rules 3001(a), 3003(c), 5005 and 9007 of the Federal Rules of Bankruptcy Procedure  
6 (the “**Bankruptcy Rules**”) and Rule 3003-1 of the Bankruptcy Local Rules for the United States  
7 District Court for the Northern District of California (the “**Bankruptcy Local Rules**”) for entry of  
8 an order (i) approving a separate bar date for Fire Claims,<sup>1</sup> (ii) approving the form for notice of the  
9 bar date for Fire Claims (attached hereto as **Exhibit A**) and related procedures, and (iii) approving  
10 supplemental procedures for providing notice of important deadlines to Fire Claimants. In support  
11 of the Motion, the TCC submits the Declaration of Steven Weisbrot (“**Weisbrot Declaration**”) and  
12 Declaration of Jeffrey R. Dion (“**Dion Declaration**”), filed contemporaneously herewith. A  
13 proposed form of order granting the relief requested herein is attached hereto as **Exhibit B** (the  
14 “**Proposed Order**”). A copy of the TCC’s proposed model Proof of Claim Form for Fire Claims  
15 is attached hereto as **Exhibit C** (the “**Fire Proof of Claim Form**”).

16 Dated: May 31, 2019

17 BAKER & HOSTETLER LLP

18 By: /s/ Eric Goodman

19 *Attorneys for The Official Committee of Tort*  
20 *Claimants*

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28 <sup>1</sup> Capitalized terms used but not defined herein shall have the meanings given to them in the Memorandum in Support  
of the TCC’s motion to approve the TCC’s model proof of claim form (Dkt. No. 1825).